

Commonwealth of Kentucky  
Before the Public Service Commission

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PUBLIC SERVICE  
COMMISSION

In the Matter of:

Application of CitiPower, LLC for Approval )  
Of Reorganization Proposal Consisting of )  
Transfer to Citi Energy, LLC )

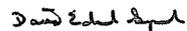
Case No. 2004-00444

ATTORNEY GENERAL'S  
MOTION TO INTERVENE

Comes now the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, pursuant to KRS 367.150(8), and moves to intervene in the above-styled proceeding. The Attorney General requests that he be permitted to intervene as a party to the fullest extent permitted by law in order to execute his statutory duties pursuant to KRS 367.150(8).

Respectfully submitted,

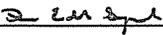
GREGORY D. STUMBO  
ATTORNEY GENERAL



David Edward Spenard  
Assistant Attorney General  
1024 Capital Center Drive, Suite 200  
Frankfort, KY 40601-8204  
502 696-5457

*Certificate of Service and Filing*

Counsel certifies that an original and ten photocopies of this Motion to Intervene were served and filed by hand delivery to Beth O'Donnell, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601; furthermore, it was served by mailing a true and correct of the same, first class postage prepaid, to Robert L. Brown III, 1005 South Main Street, Suite 101, Corbin, Kentucky 40701 and David Hutchinson, CitiPower LLC, 2122 Enterprise Road, Greensboro, North Carolina 27408, all on this 14<sup>th</sup> day of December 2004.

  
Assistant Attorney General